

DOCKET SECTION
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997


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Docket No. R97-1

**FOLLOW UP INTERROGATORY OF THE ADVERTISING MAIL
MARKETING ASSOCIATION TO THE POSTAL SERVICE
(AMMA/USPS-USPS-2)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association ("AMMA") hereby propounds the attached interrogatory and requests for the production of documents to the Postal Service. The interrogatory follows up on an interrogatory that the Postal Service redirected to Witness Daniel and was answered by her. The need for follow up was the subject of a colloquy at the hearing on December 1, 1997. Tr. 14/7360 et. seq. The instructions contained in our interrogatories to Witness Moeller (AMMA/USPS-T-36-1-3) are incorporated by reference.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Counsel to Advertising Mail Marketing
Association

AMMA/USPS-USPS-2:

Please refer to the "Mix of Handlings" column (column 1) at pages 5, 7 and 9 of USPS-T-29, Appendix I.

(a) Please confirm that Witness Daniel has testified that:

The mail flow diagrams used an entry profile based on the presort levels of containers and packages found in the subclass-specific Mail Characteristics Study (USPS-LR-H-105) to determine the sort level at which pieces in the mailstream begin piece distribution . . .

USPS-T-29 at 3 (footnotes omitted).

(b) Please confirm that in response to AMMA/USPS-LR-H-105-3, Witness Talmo, the sponsor of LR-H-105, stated that "there are no results from LR-H-105 used directly or indirectly in USPS-T-29, Appendix I, pages 5, 7 or 9."

(c) Please confirm that in response to AMMA/USPS-USPS-1 (redirected to Witness Daniel) it is stated (i) that "the initial mix of handlings of each of the three categories on pages 5, 7 and 9 [of Appendix I to USPS-T-29] is self evident;" and (ii) that "the sources of the mix of handlings in the first column appearing on pages 5, 7 and 9 of Appendix I consists of the figures presented in the boxes of the corresponding operation in the mail flow diagrams . . ."


(d) If the answers to any of the preceding subparts of this interrogatory is other than an unqualified confirmation, please explain the bases for the answer provided.

(e) Are there any sources other than those enumerated in subparts (a) - (c) of this interrogatory for (i) the data at column [1] of pages 5, 7 and 9 of USPS-T-29, Appendix I; and/or (ii) the figures presented in the boxes of the mail flow diagrams that correspond to pages 5, 7 and 9 of Appendix I to USPS-T-29. If your answer is in the affirmative, please identify the source of such data including page, line and column locations and any required derivations.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: December 2, 1997



Ian D. Volner